

MOTION FOR APPOINTMENT OF COUNSEL

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IN DECEMBER, 1949, MY PARENTS PLACED ME IN WHAT WAS THEN THE ~~PERKINS~~ SPECIAL NEEDS PERKINS SCHOOL (SINCE RE-NAMED RFK COMMUNITY ALLIANCE) IN LANCASTER, WORCESTER COUNTY, DUE TO A DIAGNOSIS OF HYDROCEPHALUS. I RESIDED THERE AND AT ITS SUMMER CAMP OCEANWARD UNTIL JUNE 1965. THE THEN-DIRECTOR OF BOTH, DAVID C PERKINS, WAS AN AUTOCRAT FOR FORBID US KIDS TO SPEAK OUT + QUESTION RULES + POLICIES HE LAID DOWN WHICH WE FELT WERE NOT IN OUR BEST INTERESTS.

THE SAID DAVID C PERKINS RAN THE SCHOOL AND CAMP LIKE A WORLD WAR II-ERA INTERMENT CAMP. WE KIDS WERE STRICTLY TOLD WHAT TO DO AND WHERE TO GO AND WHAT TO SPEAK AND NOT TO SPEAK. OUR FUNDAMENTAL FREEDOMS AND ~~HUMAN~~ HUMAN RIGHTS WERE STIFLED. VIOLATION OF THE ESTABLISHED RULES AND POLICIES RESULTED IN SUCH PUNISHMENT AS BEING MADE TO STAND FACE-IN IN A CORNER (WHICH HAPPENED TO ME MORE THAN ONCE) FOR AN HOUR OR MORE.

THERE WERE TWO PERSONAS TO THIS DAVID C PERKINS. ONE WAS WHERE US KIDS AND OUR PARENTS PUT OUR IMPLICIT TRUST IN HIM TO SAFE-GUARD OUR SAFETY AND WELL-BEING. WHICH HE MADE US BELIEVE HE DID. THIS WAS RATHER AKIN TO, SAY, THE STRONG-MAN OF ARGENTINA, JUAN DOMINGO PERON.

I DIDN'T KNOW, UNTIL TOO LATE, ABOUT HIS OTHER DARKER, SINISTER PERSONA - THAT OF A SEXUAL PREDATOR. THUS HE BETRAYED MINE + MY PARENTS' TRUST. I DIDN'T SEE THIS COMING WHEN :

IN SEPTEMBER, 1964, DAVID C PERKINS ~~TALKED~~ TALKED ME IN RETURNING WITH HIM TO CAMP OCEANWARD ON THE "PRETEXT" OF ENSURING THE CAMP WAS

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SECURED FOR THE WINTER AND TYING UP ANY LOOSE ENDS. BUT LITTLE DID I KNOW WHAT WAS COMING.

THE LAST NIGHT THERE (AND ME BEING BLISSFULLY UNAWARE), THAT "DEVIL'S TURD" INDUCED ME TO GO WITH HIM UPSTAIRS TO A BEDROOM OF THE MAIN HOUSE. ONCE THERE, I WAS TRAPPED. UNABLE TO RESIST. UNABLE TO ESCAPE. THAT DEPRAVED SOD INFLECTED UPON ME THE ABOMINATION OF SODOM AND GOMORRAH - AND I'D THOUGHT UP TO THEN HE COULD DO ME NO WRONG?

UPON RETURNING TO THE SCHOOL - AND FOR ABOUT THE NEXT 10 YEARS THERE-AFTER - I WAS IN COMPLETE DENIAL OF THAT ABOMINATION. LIKE IT NEVER HAPPENED. (I NEVER TOLD MY PARENTS. THEY DIED WITHOUT KNOWING. JUST AS WELL.) IN JUNE, 1965, I LEFT THE SCHOOL AND REJOINED MY PARENTS IN NEW YORK. I MAINTAINED CONTACT WITH MY FIRST GIRLFRIEND. (WE WERE CLASSMATES AT THE SCHOOL.) ALAS - HER PARENTS FOUND OUT ABOUT OUR ROMANCE AND DENOUNCED ME TO THAT DEVIL'S TURD, DAVID C PERKINS. WHEN I MADE A RETURN VISIT TO THE SCHOOL, THAT SWINE CONFRONTED ME AND DEMANDED THAT I BREAK OFF FROM MY GIRLFRIEND. THAT "TWO-FACED HYPOCRITE" WHO DURING MY INTERMENT AT THE SCHOOL, HAD PREACHED TO US KIDS ABOUT THE EVILS (AS HE PUT IT) OF "FORNICATION. A "SUPPOSED" MAN OF GOD WHOSE FATHER WAS AN EPISCOPAL PRIEST - AND FOR HIM TO CORRUPT HIMSELF UPON ME! THE SEXUAL ABUSE ROBBED ME OF MY INNOCENCE AND QUALITY OF LIFE FOR GOOD.

10 YEARS ON, THE NEWS BROKE THAT A CATHOLIC PRIEST IN DALLAS, TEXAS, HAD BEEN ARRESTED ON CHARGES OF SEXUAL ABUSE OF KIDS ENTRUSTED TO

ANOTHER 10 YEARS OF FURTHER MISFORTUNES AND TRIBULATIONS. I GOT FED UP WITH LIVING ONLY A DAY'S DRIVE FROM THE GROUND ZERO OF THE SEXUAL ABOMINATION, AND SO IN 2000 I MADE MY WAY DOWN HERE TO ALBANY, GA. LIFE IS A LITTLE BETTER NOW~ BUT I AM LIVING IN POVERTY ON ONLY SSI + FOOD STAMPS~ CRUMBS FROM THE GOVERNMENT'S TABLE.

ALL OF THE FOREGOING SPEAKS TO WHY I AM JUSTIFIED IN MY CLAIM FOR FINANCIAL COMPENSATION FOR MY SEXUAL ABUSE FROM THE RFK COMMUNITY ALLIANCE. ~~THESE ARE THE FACTS OF THE MATTER, AND THAT YOU OWE ME TOWARD MY 13 YEARS OF SERVICE THE \$100,000 COMPENSATION~~

SINCERELY,
Kirby Browning
KIRBY BROWNING
PH# (229) 405-4937